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EPA-OTS



000617706R

90-890000065

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Comprehensive Assessment Information Rule
REPORTING FORM

When completed, send this form to:

Document Processing Center
Office of Toxic Substances, TS-790
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460
Attention: CAIR Reporting Office

For Agency Use Only:

Date of Receipt: _____

Document
Control Number: _____

Docket Number: _____

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been

completed in response to the Federal Register Notice of..... [1][2] [2][2] [8][8]
CBI mo. day year

☐ a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. [0][2][6][4][7][1]-[6][2]-[5]

b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.

(i) Chemical name as listed in the rule N/A

(ii) Name of mixture as listed in the rule N/A

(iii) Trade name as listed in the rule N/A

c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.

Name of category as listed in the rule N/A

CAS No. of chemical substance [N/A]-[]-[]

Name of chemical substance N/A

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

CBI Manufacturer 1

☐ Importer 2

☒ Processor 3

X/P manufacturer reporting for customer who is a processor 4

X/P processor reporting for customer who is a processor 5

☐ Mark (X) this box if you attach a continuation sheet.

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI
☐ Yes ☒ Go to question 1.04
☐ No ☐ Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI
☐ Yes 1
☒ No 2

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s)

☐ You have chosen to report for your customers

☐ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

* Note: We only export material not reacted

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI
Trade name

☐ Is the trade name product a mixture? Circle the appropriate response.

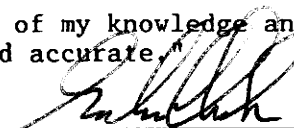
Yes 1

No 2

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI
☐ "I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

Gordon Clark
NAME


SIGNATURE

5/14/89
DATE SIGNED

Owner
TITLE

(808) 885-6965
TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

PART B CORPORATE DATA

1.09 Facility Identification

CBI Name GORDON CLARK DEBA CLARK FOAM
☐ Address 25887 CROWN VALLEY PKY. ☐
Street
SOUTH LAGUNA ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
City
CA 91677 ☐ ☐ ☐ ☐
State Zip
Dun & Bradstreet Number UK ☐ ☐ ☐ ☐ ☐ ☐
EPA ID Number CAX000064527
Employer ID Number 952766756
Primary Standard Industrial Classification (SIC) Code 2821
Other SIC Code ☐ ☐ ☐ ☐
Other SIC Code ☐ ☐ ☐ ☐

1.10 Company Headquarters Identification

Same as above

CBI Name ☐
☐ Address ☐
Street
☐
City
☐
State Zip
Dun & Bradstreet Number ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
Employer ID Number ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐

☐ Mark (X) this box if you attach a continuation sheet.

SAME AS ABOVE

[illegible][illegible]

 --

State Zip

Dun & Bradstreet Number[]-[]-[]-[]

CBI Name [G][O][R][D][O][N] [C][L][A][R][K]

[illegible]

Address P.O. Box 2620 Street

[K][A][M][U][E][L][A] [] [] [] [] [] [] [] [] [] [] [] [] [] [] []
City

[H][I] [9][6][7][4][3]--[][][][]
State Zip

Telephone Number[8][0][8]-[8][8][5]-[6][9][6][5]

1.13 This reporting year is from [01] [88] to [12] [88]
Mo. Year Mo. Year

☐ Mark (X) this box if you attach a continuation sheet.

[illegible]

N/A

CBI Name of Buyer []
[] Mailing Address []
Street

[]
City

[][] [][][][][]--[][][][]
State Zip

Employer ID Number[][][][][][][][]
Date of Purchase[][][] [][][] [][][]
Mo. Day Year

Contact Person []
Telephone Number[][][]-[][][]-[][][][]

8

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

☐ Classification Quantity (kg/yr)

Manufactured N/A

Imported N/A

Processed (include quantity repackaged) 600 109

Of that quantity manufactured or imported, report that quantity:

In storage at the beginning of the reporting year N/A

For on-site use or processing N/A

For direct commercial distribution (including export) N/A

In storage at the end of the reporting year N/A

Of that quantity processed, report that quantity:

In storage at the beginning of the reporting year 10000

Processed as a reactant (chemical producer) 552242

Processed as a formulation component (mixture producer) 47867

Processed as an article component (article producer) N/A

Repackaged (including export) N/A

In storage at the end of the reporting year 10000

* Note the 47867 kg is the TDI content of prepolymer resins exported overseas. The 552242 kg is made into polyurethane foam plastic and is an article.

☐ Mark (X) this box if you attach a continuation sheet.

PART C IDENTIFICATION OF MIXTURES

1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

CBI

☐

Component Name	Supplier Name	Average % Composition by Weight (specify precision, e.g., 45% ± 0.5%)
TDI	Mobay Chemical	78.814 ± 0.22
Polyurethane Polyol	Clark Form	21.186 ± 0.22
Total		100%

* Note we purchase TDI and then make a polyurethane prepolymer which contains TDI and is a "listed substance". The polyurethane polyol is manufactured from commodity chemicals at our plant and only for internal use. The polyol is not at all toxic, etc.

☐ Mark (X) this box if you attach a continuation sheet.

2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending [7] [2] [8] [7]
Mo. Year

Quantity manufactured N/A kg

Quantity imported N/A kg

Quantity processed 634129 kg

Year ending [1] [2] [8] [6]
Mo. Year

Quantity manufactured N/A kg

Quantity imported N/A kg

Quantity processed 622789 kg

Year ending [1] [2] [8] [5]
Mo. Year

Quantity manufactured N/A kg

Quantity imported N/A kg

Quantity processed 612742 kg

2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI

☐ N/A

Continuous process 1

Semicontinuous process 2

Batch process 3

*

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types.

- ☐ Continuous process 1
- ☐ Semicontinuous process 2
- ☐ Batch process 3

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.)

- ☐ Manufacturing capacity N/A kg/yr
- ☐ Processing capacity N/A kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume.

	Manufacturing Quantity (kg)	Importing Quantity (kg)	Processing Quantity (kg)
Amount of increase	<u>N/A</u>	<u>N/A</u>	
Amount of decrease	<u>N/A</u>	<u>N/A</u>	<u>20,000 kg</u>

☐ Mark (X) this box if you attach a continuation sheet.

2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

<input type="checkbox"/>	(Blank)	<u>Days/Year</u>	<u>Average Hours/Day</u>
Process Type #1 (The process type involving the largest quantity of the listed substance.)			
	Manufactured	<u>N/A</u>	<u>N/A</u>
	Processed	<u>250</u>	<u>24</u>
	(slab)		
Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)			
	Manufactured	<u>N/A</u>	<u>N/A</u>
	Processed	<u>180</u>	<u>8</u>
	(PP Drum)		
Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)			
	Manufactured	<u>N/A</u>	<u>NA</u>
	Processed	<u>12</u>	<u>4</u>

2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

<input type="checkbox"/>	Maximum daily inventory	<u>18000</u>	kg
	Average monthly inventory	<u>10000</u>	kg

☐ Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI

☐

<u>CAS No.</u>	<u>Chemical Name</u>	<u>Byproduct, Coproduct or Impurity¹</u>	<u>Concentration (%) (specify ± % precision)</u>	<u>Source of By-products, Coproducts, or Impurities</u>
N/A				

¹Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct
C = Coproduct
I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

- 2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a. Product Types ¹	b. % of Quantity Manufactured, Imported, or Processed	c. % of Quantity Used Captively On-Site	d. Type of End-Users ²
B	92.02%	100%	I
X	7.98%	0%	H

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) <u>Polyurethane</u>

²Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer	
CM = Commercial	H = Other (specify) <u>Exported</u>	<u>100%</u>

☐ Mark (X) this box if you attach a continuation sheet.

2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types ¹	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users ²
B	92%	100%	I
X	8%	0%	H

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) <u>polyurethane</u>

²Use the following codes to designate the type of end-users: pre polymer resin

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) <u>EXPORTED 100%</u>

☐ Mark (X) this box if you attach a continuation sheet.

2.14 Final Product -- Complete the following table for each type of final product manufactured, imported, or processed at your facility that contains the listed substance other than as an impurity.

☐

a.	b.	c.	d.
Product Type ¹	Final Product's Physical Form ²	Average % Composition of Listed Substance in Final Product	Type of End-Users ³
X	B	68.4%	H

¹Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) <u>Polyurethane</u>

²Use the following codes to designate the final product's physical form:

A = Gas	F2 = Crystalline solid
B = Liquid	F3 = Granules
C = Aqueous solution	F4 = Other solid
D = Paste	G = Gel
E = Slurry	H = Other (specify) _____
F1 = Powder	

³Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) <u>Export 100%</u>

☐ Mark (X) this box if you attach a continuation sheet.

2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the CBI listed substance to off-site customers.

☐ Truck 1
Railcar 2
Barge, Vessel 3
Pipeline 4
Plane 5
Other (specify) 55 gallon drums by containerized ocean freight 6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers or prepared by your customers during the reporting year for use under each category of end use listed (i-iv).
CBI

☐

Category of End Use

i. Industrial Products

Chemical or mixture 0 kg/yr
Article 0 kg/yr

ii. Commercial Products

Chemical or mixture 0 kg/yr
Article 0 kg/yr

iii. Consumer Products

Chemical or mixture 0 kg/yr
Article 0 kg/yr

iv. Other

Distribution (excluding export) 0 kg/yr
Export 47867 kg/yr
Quantity of substance consumed as reactant 0 kg/yr
Unknown customer uses 0 kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

2.17 State the quantity of the listed substance that you exported during the reporting
CBI year.

☐ In bulk N/A kg/yr
As a mixture 47867 kg/yr
In articles 168000 kg/yr

* Note the 47867 kg is the TDI in the
polymer resin exported. The 168000 kg
is our best estimate of the polyurethane
foam plastic exported as articles.

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

PART A GENERAL DATA

- 3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.
CBI The average price is the market value of the product that was traded for the listed substance.

☐

<u>Source of Supply</u>	<u>Quantity (kg)</u>	<u>Average Price (\$/kg)</u>
The listed substance was manufactured on-site.	<u>N/A</u>	<u>N/A</u>
The listed substance was transferred from a different company site.	<u>N/A</u>	<u>N/A</u>
The listed substance was purchased directly from a manufacturer or importer.	<u>600109</u>	<u>2.346</u>
The listed substance was purchased from a distributor or repackager.	<u>N/A</u>	<u>N/A</u>
The listed substance was purchased from a mixture producer.	<u>N/A</u>	<u>N/A</u>

- 3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

☐

- Truck 1
- Railcar 2
- Barge, Vessel 3
- Pipeline 4
- Plane 5
- Other (specify) _____ 6

☐ Mark (X) this box if you attach a continuation sheet.

3.03 a. Circle all applicable containers used to transport the listed substance to your facility.
CBI

☐ Bags 1
Boxes 2
Free standing tank cylinders 3
Tank rail cars 4
Hopper cars 5
Tank trucks 6
Hopper trucks 7
Drums 8
Pipeline 9
Other (specify) _____ 10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders N/A mmHg
Tank rail cars N/A mmHg
Tank trucks UK mmHg

* Note tank trucks are not supposed to be pressurized until on site for unloading. Unfortunately some drivers do use pressure to speed delivery. This is beyond our control as we are not the supplier. We receive F.O.B. our plant.

☐ Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

CBI

☐

<u>Trade Name</u>	<u>Supplier or Manufacturer</u>	<u>Average % Composition by Weight (specify \pm % precision)</u>	<u>Amount Processed (kg/yr)</u>
<u>N/A</u>			

☐ Mark (X) this box if you attach a continuation sheet.

PART C RAW MATERIAL VOLUME

3.05 State the quantity of the listed substance used as a raw material during the
CBI reporting year in the form of a class I chemical, class II chemical, or polymer, and
the percent composition, by weight, of the listed substance.

☐

	Quantity Used (kg/yr)	% Composition by Weight of Listed Sub- stance in Raw Material (specify \pm % precision)
Class I chemical	660 109	99.9 minimum
Class II chemical		
Polymer		

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

PART A PHYSICAL/CHEMICAL DATA SUMMARY

- 4.01 Specify the percent purity for the three major¹ technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

☐

	<u>Manufacture</u>	<u>Import</u>	<u>Process</u>
Technical grade #1	<u>N/A</u> % purity	<u>N/A</u> % purity	<u>99.9</u> % purity
Technical grade #2	<u>N/A</u> % purity	<u>N/A</u> % purity	<u>N/A</u> % purity
Technical grade #3	<u>N/A</u> % purity	<u>N/A</u> % purity	<u>N/A</u> % purity

¹Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes 1

No 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company 1

Another source 2

☐ Mark (X) this box if you attach a continuation sheet.

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

Yes 1
 No 2

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the final state of the product.

CBI
☐

Activity	Physical State				
	Solid	Slurry	Liquid	Liquified Gas	Gas
Manufacture	1	2	3	4	5
Import	1	2	3	4	5
Process	1	2	3	4	5
Store	1	2	3	4	5
Dispose	1	2	3	4	5
Transport	1	2	3	4	5

☐ Mark (X) this box if you attach a continuation sheet.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles ≥ 10 microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI

☐

<u>Physical State</u>		<u>Manufacture</u>	<u>Import</u>	<u>Process</u>	<u>Store</u>	<u>Dispose</u>	<u>Transport</u>
Dust	<1 micron						
	1 to <5 microns						
	5 to <10 microns						
Powder	<1 micron						
	1 to <5 microns						
	5 to <10 microns						
Fiber	<1 micron						
	1 to <5 microns						
	5 to <10 microns						
Aerosol	<1 micron						
	1 to <5 microns						
	5 to <10 microns						

☐ Mark (X) this box if you attach a continuation sheet.

PART B FIRE, EXPLOSION, AND OTHER HAZARD DATA

4.06 For each physical state of the listed substance, specify the corresponding flashpoint, and the test method used to derive the flashpoint value.

Solid

Flashpoint °C

Test method

Liquid

Flashpoint °C

Test method

Gas/Vapor

Flashpoint °C

Test method

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

4.07 Indicate the temperature at which the listed substance undergoes autopolymerization or autodecomposition.

Autopolymerizes at °C

Autodecomposes at °C

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

☐ Mark (X) this box if you attach a continuation sheet.

4.08 Indicate the flammable limits in air (% by volume) for the listed substance at standard temperature and pressure.

Lower limit %

Upper limit %

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

☐ Mark (X) this box if you attach a continuation sheet.

4.09 Extinguishing Media -- Identify (Y/N/NA/UK) all known methods for extinguishing flames caused by each product type which contains the listed substance. (Refer to the instructions for the definition of Y, N, NA and UK.)

<u>Extinguishing Media</u>	<u>Product Types Containing the Listed Substance¹</u>					
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>
Water	_____	_____	_____	_____	_____	_____
Foam	_____	_____	_____	_____	_____	_____
CO ₂	_____	_____	_____	_____	_____	_____
Dry chemical (e.g., sodium bicarbonate)	_____	_____	_____	_____	_____	_____
Halogenated hydrocarbon (e.g., carbon tetrachloride, methyl bromide)	_____	_____	_____	_____	_____	_____
Other (specify) _____	_____	_____	_____	_____	_____	_____

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

¹Identify the product types listed under each column (1-6) in the following table:

<u>Product Type No.</u>	<u>Product Type Identity</u>
1	_____
2	_____
3	_____
4	_____
5	_____
6	_____

☐ Mark (X) this box if you attach a continuation sheet.

4.10 Special Firefighting Procedures -- Identify (Y/N/NA/UK) all known restrictions on firefighting procedures used to combat fires caused by each product type which contains the listed substance. (Refer to the instructions for definitions of Y, N, NA and UK.)

<u>Special Firefighting Procedures</u>	<u>Product Types Containing the Listed Substance¹</u>					
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>
Do not use water	_____	_____	_____	_____	_____	_____
Do not increase air pressure	_____	_____	_____	_____	_____	_____
Other (specify) _____	_____	_____	_____	_____	_____	_____

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

¹Identify the product types listed under each column (1-6) in the following table:

<u>Product Type No.</u>	<u>Product Type Identity</u>
1	_____
2	_____
3	_____
4	_____
5	_____
6	_____

☐ Mark (X) this box if you attach a continuation sheet.

4.11 Incompatibility -- List all chemicals, materials, or categories of chemicals or materials that you know are incompatible with the listed substance and the reason why they are incompatible. (Refer to the instructions for further explanation and an example.)

<u>CAS No.</u>	<u>Name</u>	<u>Reaction (specify)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

4.12 Autoxidation -- Is the listed substance capable of autoxidation? Circle the appropriate response.

Yes 1

No 2

Unknown 3

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

☐ Mark (X) this box if you attach a continuation sheet.

4.13 Indicate the autoignition temperature for the listed substance and the test method used to derive this value.

Autoignition temperature °C

Test method

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

4.14 Vapor in Cargo Tanks -- If storing the listed substance in a cargo tank causes vapor problems, such as peroxide formation, reaction with moisture, etc., specify the problem and necessary controls or restrictions used to remedy each problem.

Vapor Problem

Controls/Restrictions

Peroxide formation

Reaction with moisture

Combustion

Other (specify)

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

☐ Mark (X) this box if you attach a continuation sheet.

4.15 Shipment Procedures -- If you use an inhibitor or stabilizer when shipping the listed substance in bulk form, specify its name, whether it inhibits or stabilizes the listed substance, the amount normally added, and the duration of its effectiveness.

CBI

☐

<u>Name of Additive</u>	<u>Inhibitor or Stabilizer¹</u>	<u>Amount Normally Added (ppm or %)</u>	<u>Duration of Effectiveness (specify units)</u>
<u>N/A</u>			

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

¹Use the following codes to designate inhibitor and stabilizer:

I = Inhibitor
S = Stabilizer

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 5 ENVIRONMENTAL FATE

PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis:

Absorption spectrum coefficient (peak) UK (1/M cm) at _____ nm
 Reaction quantum yield, ϕ UK at _____ nm
 Direct photolysis rate constant, k_p , at ... UK 1/hr _____ latitude

b. Oxidation constants at 25°C:

For 1O_2 (singlet oxygen), k_{ox} UK 1/M hr
 For RO_2 (peroxy radical), k_{ox} UK 1/M hr

c. Five-day biochemical oxygen demand, BOD_5 ... UK mg/l

d. Biotransformation rate constant:

For bacterial transformation in water, k_b ... UK 1/hr
 Specify culture UK

e. Hydrolysis rate constants:

For base-promoted process, k_b UK 1/M hr
 For acid-promoted process, k_a UK 1/M hr
 For neutral process, k_n UK 1/hr

f. Chemical reduction rate (specify conditions) UK

g. Other (such as spontaneous degradation) ... UK

* Note TDI is a widely used commodity.
 The polyurethane prepolymer resin we
 manufacture behaves similar to TDI
 except it is more viscous.

☐ Mark (X) this box if you attach a continuation sheet.

PART B PARTITION COEFFICIENTS

5.02 a. Specify the half-life of the listed substance in the following media.

<u>Media</u>	<u>Half-life (specify units)</u>
Groundwater	<u>UK</u>
Atmosphere	<u>UK</u>
Surface water	<u>UK</u>
Soil	<u>UK</u>

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

<u>CAS No.</u>	<u>Name</u>	<u>Half-life (specify units)</u>	<u>Media</u>
<u>UK</u>			in
			in
			in
			in

5.03 Specify the octanol-water partition coefficient, K_{ow} ... UK at 25°C
 Method of calculation or determination UK

5.04 Specify the soil-water partition coefficient, K_d UK at 25°C
 Soil type UK

5.05 Specify the organic carbon-water partition coefficient, K_{oc} UK at 25°C

5.06 Specify the Henry's Law Constant, H UK atm-m³/mole

* Note: See bottom of page 35

☐ Mark (X) this box if you attach a continuation sheet.

5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

Bioconcentration Factor

Species

Test¹

UK		

¹Use the following codes to designate the type of test:

F = Flowthrough

S = Static

* Note: see bottom of page 35

☐ Mark (X) this box if you attach a continuation sheet.

6.04 For each market listed below, state the quantity sold and the total sales value of the listed substance sold or transferred in bulk during the reporting year.

☐

<u>Market</u>	<u>Quantity Sold or Transferred (kg/yr)</u>	<u>Total Sales Value (\$/yr)</u>
Retail sales	NA	NA
Distribution -- Wholesalers	NA	NA
Distribution -- Retailers	NA	NA
Intra-company transfer	NA	NA
Repackagers	NA	NA
Mixture producers	NA	NA
Article producers	NA	NA
Other chemical manufacturers or processors	NA	NA
Exporters	NA	NA
Other (specify)	NA	NA

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist for the listed substance and state the cost of each substitute. A commercially feasible substitute is one which is economically and technologically feasible to use in your current operation, and which results in a final product with comparable performance in its end uses.

CBI

☐

<u>Substitute</u>	<u>Cost (\$/kg)</u>
UK	UK

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 7 MANUFACTURING AND PROCESSING INFORMATION

General Instructions:

For questions 7.04-7.06, provide a separate response for each process block flow diagram provided in questions 7.01, 7.02, and 7.03. Identify the process type from which the information is extracted.

PART A MANUFACTURING AND PROCESSING PROCESS TYPE DESCRIPTION

7.01 In accordance with the instructions, provide a process block flow diagram showing the major (greatest volume) process type involving the listed substance.

CBI

☐ Process type Polyurethane Foam Prepolymer
Resin Manufacture

* See Attachment Section 2
or depending on interpretation
Section 1

* Note attachment at
rear

☒ Mark (X) this box if you attach a continuation sheet.

7.03 In accordance with the instructions, provide a process block flow diagram showing all process emission streams and emission points that contain the listed substance and which, if combined, would total at least 90 percent of all facility emissions if not treated before emission into the environment. If all such emissions are released from one process type, provide a process block flow diagram using the instructions for question 7.01. If all such emissions are released from more than one process type, provide a process block flow diagram showing each process type as a separate block.

CBI

☐ Process type

* See attachments

* Note is not applicable for liquids

☐ Mark (X) this box if you attach a continuation sheet.

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type _____

<u>Unit Operation ID Number</u>	<u>Typical Equipment Type</u>	<u>Operating Temperature Range (°C)</u>	<u>Operating Pressure Range (mm Hg)</u>	<u>Vessel Composition</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

** See attachments*

☐ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type _____

<u>Process Stream ID Code</u>	<u>Process Stream Description</u>	<u>Physical State¹</u>	<u>Stream Flow (kg/yr)</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

¹Use the following codes to designate the physical state for each process stream:

GC = Gas (condensable at ambient temperature and pressure)
 GU = Gas (uncondensable at ambient temperature and pressure)
 SO = Solid
 SY = Sludge or slurry
 AL = Aqueous liquid
 OL = Organic liquid
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

** See attachments*

☐ Mark (X) this box if you attach a continuation sheet.

CBI

[]

[illegible]

7.06 continued below

* See attachment

[]

7.06 (continued)

** See attachment*

¹For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

<u>Additive Package Number</u>	<u>Components of Additive Package</u>	<u>Concentrations (% or ppm)</u>
<u>1</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>2</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>3</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>4</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>
<u>5</u>	<hr/> <hr/> <hr/>	<hr/> <hr/> <hr/>

²Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

³Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

☐ Mark (X) this box if you attach a continuation sheet.

PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.01.

CBI

☐ Process type

See attachment under
methylene chloride and Emissions

☐ Mark (X) this box if you attach a continuation sheet.

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

¹Use the following codes to designate the type of hazardous waste:

I = Ignitable
C = Corrosive
R = Reactive
E = EP toxic
T = Toxic
H = Acutely hazardous

²Use the following codes to designate the physical state of the residual:

GC = Gas (condensable at ambient temperature and pressure)
GU = Gas (uncondensable at ambient temperature and pressure)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

³For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
<u>1</u>		
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		

** See attachment*

⁴Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

⁵Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

⁶Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

<u>Code</u>	<u>Method</u>	<u>Detection Limit</u> <u>(± ug/l)</u>
<u>1</u>		
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		
<u>6</u>		

☐ Mark (X) this box if you attach a continuation sheet.

CBI

[illegible]

²Use the codes provided in Exhibit 8-2 to designate the management methods

58

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

Incinerator	Combustion Chamber Temperature (°C)		Location of Temperature Monitor		Residence Time In Combustion Chamber (seconds)	
	Primary	Secondary	Primary	Secondary	Primary	Secondary
1						
2						
3						

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1
No 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

Incinerator	Air Pollution Control Device ¹	Types of Emissions Data Available
1		
2		
3		

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1
No 2

¹Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)
E = Electrostatic precipitator
O = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records on the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

CBI

☐

Data Element	Data are Maintained for:		Year in Which Data Collection Began	Number of Years Records Are Maintained
	Hourly Workers	Salaried Workers		
Date of hire	X	X	1979	minimum 1
Age at hire	X	X	1979	minimum 1
Work history of individual before employment at your facility	X	X	1985	minimum 1
Sex	NA	NA	NA	NA
Race	NA	NA	NA	NA
Job titles	NA	NA	NA	NA
Start date for each job title	NA	NA	NA	NA
End date for each job title	NA	NA	NA	NA
Work area industrial hygiene monitoring data	X	X	1982	forever
Personal employee monitoring data	X	X	1982	forever
Employee medical history	X	X	1982	forever
Employee smoking history	NA	NA	NA	NA
Accident history	X	X	1982	forever
Retirement date	NA	NA	NA	NA
Termination date	X	X	1979	1
Vital status of retirees	NA	NA	NA	NA
Cause of death data	NA	NA	NA	NA

☐ Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

a.	b.	c.	d.	e.
<u>Activity</u>	<u>Process Category</u>	<u>Yearly Quantity (kg)</u>	<u>Total Workers</u>	<u>Total Worker-Hours</u>
Manufacture of the listed substance	Enclosed	N/A		
	Controlled Release	N/A		
	Open	N/A		
On-site use as reactant <i>Form Made</i>	Enclosed	N/A		
	Controlled Release	552242	21	32400
	Open			
On-site use as nonreactant	Enclosed			
	Controlled Release			
	Open			
On-site preparation of products <i>Prep & Run</i>	Enclosed			
	Controlled Release	47867	3	50
	Open			

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A

Foam Pourer

B

Foam Pourer Helper

C

Foam Machine Operator

D

Resin Production Control

E

F

G

H

I

J

☐ Mark (X) this box if you attach a continuation sheet.

9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

CBI

☐ Process type

** See attachment*

☒ Mark (X) this box if you attach a continuation sheet.

BUILDING IS 50' X 100' CONCRETE
TILT UP CONSTRUCTION WITH ONLY
TWO DOORS.

TDI ENTERS BUILDING
HERE FROM TANK TRUCK

SECTION 2
POLYURETHANE PREPOLYMER
RESIN MANUFACTURE

LABOR CATAGORY D

DOOR

RAISED
TO FORM
DIKE

PLANT LAYOUT SHOWING 3 WORK AREAS

DOOR

RAISED
TO FORM
DIKE

ALL FUMES
FROM
BUILDING
EX-HAUST
THROUGH
30 HP
BLOWER
LOCATED
HERE

SECTION 1
POLYURETHANE FOAM PLASTIC MANUFACTURE

LABOR CATAGORY A AND B

SECTION 3
POLYURETHANE FOAM PLASTIC MANUFACTURE
LABOR CATAGORY C

9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. Add any additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Entire Plant

Work Area ID

Description of Work Areas and Worker Activities

1

Molding Polyurethane Foam

2

Manufacture Polyurethane Prepolymer Resin

3

Manufacturing Polyurethan Foam Buns

4

5

6

7

8

9

10

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI ☐ Process type Molding Polyurethane Foam
 Work area Section 1

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
<u>A</u>	<u>9</u>	<u>fumes</u>	<u>OL, GU</u>	<u>D</u>	<u>240</u>
<u>B</u>	<u>9</u>	<u>fumes</u>	<u>OL, GU</u>	<u>D</u>	<u>240</u>

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensible at ambient temperature and pressure)	SY = Sludge or slurry
GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)	AL = Aqueous liquid
SO = Solid	OL = Organic liquid
	IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less	D = Greater than 2 hours, but not exceeding 4 hours
B = Greater than 15 minutes, but not exceeding 1 hour	E = Greater than 4 hours, but not exceeding 8 hours
C = Greater than one hour, but not exceeding 2 hours	F = Greater than 8 hours

☒ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI Process type Manufacturing Polyurethane Prepolymer
 Work area Section 2

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
<u>D</u>	<u>3</u>	<u>fumes</u>	<u>OL, GU</u>	<u>A</u>	<u>180</u>

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)	SY = Sludge or slurry
GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)	AL = Aqueous liquid
SO = Solid	OL = Organic liquid
	IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less	D = Greater than 2 hours, but not exceeding 4 hours
B = Greater than 15 minutes, but not exceeding 1 hour	E = Greater than 4 hours, but not exceeding 8 hours
C = Greater than one hour, but not exceeding 2 hours	F = Greater than 8 hours

☒ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

☒ CBI Process type Manufacturing Polyurethane Foam
 Work area Section 3

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance ¹	Average Length of Exposure Per Day ²	Number of Days per Year Exposed
<u>C</u>	<u>3</u>	<u>fumes</u>	<u>OL, GU</u>	<u>D</u>	<u>180</u>

¹Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)	SY = Sludge or slurry
GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)	AL = Aqueous liquid
SO = Solid	OL = Organic liquid
	IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

²Use the following codes to designate average length of exposure per day:

A = 15 minutes or less	D = Greater than 2 hours, but not exceeding 4 hours
B = Greater than 15 minutes, but not exceeding 1 hour	E = Greater than 4 hours, but not exceeding 8 hours
C = Greater than one hour, but not exceeding 2 hours	F = Greater than 8 hours

☒ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Polyurethane Foam Manufacture
Work area Section 1

Labor Category	8-hour TWA Exposure Level (ppm, mg/m ³ , other-specify)	15-Minute Peak Exposure Level (ppm, mg/m ³ , other-specify)
<u>A</u>	<u>less than .002 ppm</u>	<u>less than .002 ppm</u>
<u>B</u>	<u>less than .002 ppm</u>	<u>less than .002 ppm</u>

☒ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI
☐ Process type Manufacturing Polyurethane Pre Polymer Resin
 Work area section 2

Labor Category	8-hour TWA Exposure Level (ppm, mg/m ³ , other-specify)	15-Minute Peak Exposure Level (ppm, mg/m ³ , other-specify)
<u>D</u>	<u>less than .002 ppm</u>	<u>less than .002 ppm</u>

☒ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type

Polyethylene Foam Manufacture

Work area

Section

3

Labor Category

8-hour TWA Exposure Level
(ppm, mg/m³, other-specify)

15-Minute Peak Exposure Level
(ppm, mg/m³, other-specify)

C

Less than .002 ppm

Less than .002 ppm

☐

Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

☐

Sample/Test	Work Area ID	Testing Frequency (per year)	Number of Samples (per test)	Who Samples ¹	Analyzed In-House (Y/N)	Number of Years Records Maintained
Personal breathing zone	1,2,3	2	8	C, D-2	N	Forever
General work area (air)	1,2,3	2	8	C, D-2	N	Forever
Wipe samples	NA	NA	NA	NA	NA	NA
Adhesive patches	NA	NA	NA	NA	NA	NA
Blood samples	1,2,3	2	1	D-3	N	Forever
Urine samples	1,2,3	2	1	D-3	N	Forever
Respiratory samples	1,2,3	2	1	D-3	N	Forever
Allergy tests	NA	NA	NA	NA	NA	NA
Other (specify)						
Mechanical Ventilation	1,2	weekly (52)	1	D-1	Y	Forever
Other (specify)						
Movement Tests						
Other (specify)						

¹Use the following codes to designate who takes the monitoring samples:

- A = Plant industrial hygienist
- B = Insurance carrier
- C = OSHA consultant
- D = Other (specify)

1. Plant Safety or Plant Maintenance
 2. Suppliers Industrial Hygienist
 3. Physician (Licensed)

☐ Mark (X) this box if you attach a continuation sheet.

9.09 For each sample type identified in question 9.08, describe the type of sampling and analytical methodology used for each type of sample.

☐ Sample Type Sampling and Analytical Methodology

<u>UK</u>	<u>UK</u>

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

CBI

☐ Equipment Type¹ Detection Limit² Manufacturer Averaging Time (hr) Model Number

<u>UK</u>	<u>UK</u>	<u>UK</u>	<u>UK</u>	<u>UK</u>

¹Use the following codes to designate personal air monitoring equipment types:

- A = Passive dosimeter
- B = Detector tube
- C = Charcoal filtration tube with pump
- D = Other (specify) _____

Use the following codes to designate ambient air monitoring equipment types:

- E = Stationary monitors located within work area
- F = Stationary monitors located within facility
- G = Stationary monitors located at plant boundary
- H = Mobile monitoring equipment (specify) _____
- I = Other (specify) _____

²Use the following codes to designate detection limit units:

- A = ppm
- B = Fibers/cubic centimeter (f/cc)
- C = Micrograms/cubic meter (μm^3)

☐ Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

☐

Test Description

Frequency

(weekly, monthly, yearly, etc.)

physical examination per
OSHA requirements

Every 6 months

☐ Mark (X) this box if you attach a continuation sheet.

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

[] Process type features like room / bathroom

Work area section 1

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	<u>Y</u>	<u>1982</u>	<u>N</u>	<u>N/A</u>
General dilution	<u>Y</u>	<u>1964</u>	<u>Y</u>	<u>U.K. and 1982</u>
Other (specify)				
<hr/>				
Vessel emission controls	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Mechanical loading or packaging equipment	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Other (specify)				

☒ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Manufacture Polyurethane Prepolymer Foam
Work area Station 2

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	<u>Y</u>	<u>1982</u>	<u>N</u>	<u>N/A</u>
General dilution	<u>Y</u>	<u>1964</u>	<u>Y</u>	<u>Unknown 1982</u>
Other (specify) _____	<u>NA</u>	_____	_____	_____
Vessel emission controls	<u>Y</u>	<u>1988</u>	<u>N</u>	<u>N/A</u>
Mechanical loading or packaging equipment	<u>NA</u>	<u>NA</u>	_____	_____
Other (specify) _____	<u>NA</u>	<u>NA</u>	_____	_____

☒ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type

Work area

Polyurethane Foam Manufacture

Section 3

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	<u>Y</u>	<u>1967</u>	<u>Y</u>	<u>UK</u>
General dilution	<u>Y</u>	<u>1967</u>	<u>Y</u>	<u>UK</u>
Other (specify)				
<u>Vessel emission controls</u>	<u>Y</u>	<u>1967</u>	<u>Y</u>	<u>1982</u>
Mechanical loading or packaging equipment	<u>NA</u>			
Other (specify)				

☐

Mark (X) this box if you attach a continuation sheet.

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Polyurethane Foam and Pre Polymer Mfg.
 Work area Section 1 and 2

Equipment or Process Modification	Reduction in Worker Exposure Per Year (%)
<u>Water vaporizer to decrease temperature and fumes</u>	<u>UK</u>

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

[] Process type Polyurethane Foam Manufacture
Work area Section 1

Equipment Types	Wear or Use (Y/N)
Respirators	<u>Y</u>
Safety goggles/glasses	<u>N</u>
Face shields	<u>Y</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>N</u>
Other (specify)	
<u>see below</u>	

* See below

* Respirators used are the full face mask types with a live air supply

[X] Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Ethylene Glycol Polymer Manufacture
Work area Section 2

Equipment Types	Wear or Use (Y/N)
Respirators	<u>Y</u>
Safety goggles/glasses	<u>Y N</u>
Face shields	<u>Y</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>N</u>
Other (specify)	
<u>see below</u>	

* see below

* Respirators used are the full face mask type with a line air supply

☒ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type Polyurethane Foam Manufacturing
Work area Section 3

<u>Equipment Types</u>	<u>Wear or Use (Y/N)</u>
Respirators	<u>Y</u>
Safety goggles/glasses	<u>N</u>
Face shields	<u>Y</u> * see below
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>N</u>
Other (specify)	
<u>see below</u>	

* Respirators used are the full face mask type with a live air supply

☐ Mark (X) this box if you attach a continuation sheet.

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Polyurethane Foam Manufacture

Work Area	Respirator Type	Average Usage ¹	Fit Tested (Y/N)	Type of Fit Test ²	Frequency of Fit Tests (per year)
<u>1</u>	<u>Full face - Live air</u>	<u>A</u>	<u>Y</u>	<u>QL, QT</u>	<u>weekly (52)</u>
<u>3</u>	<u>Full face - Live air</u>	<u>A</u>	<u>Y</u>	<u>QL, QT</u>	<u>weekly (52)</u>
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

¹Use the following codes to designate average usage:

A = Daily
 B = Weekly
 C = Monthly
 D = Once a year
 E = Other (specify) _____

²Use the following codes to designate the type of fit test:

QL = Qualitative
 QT = Quantitative

☒ Mark (X) this box if you attach a continuation sheet.

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐

Process type

Polyurethane Pre Polymer Manufacture

Work Area	Respirator Type	Average Usage ¹	Fit Tested (Y/N)	Type of Fit Test ²	Frequency of Fit Tests (per year)
<u>2</u>	<u>full face - linear</u>	<u>A</u>	<u>Y</u>	<u>QL, QT</u>	<u>weekly (52)</u>
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

¹Use the following codes to designate average usage:

A = Daily

B = Weekly

C = Monthly

D = Once a year

E = Other (specify) _____

²Use the following codes to designate the type of fit test:

QL = Qualitative

QT = Quantitative

☐

Mark (X) this box if you attach a continuation sheet.

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type Whole Plant - Mfg. Polyurethane foam and prepolymer

	Work Area	Respirator Type	Average Usage ¹	Fit Tested (Y/N)	Type of Fit Test ²	Frequency of Fit Tests (per year)
<i>Section</i>	1	Full face - live air	A	Y	QL, QT	weekly
	2	Full face - live air	A	Y	QL, QT	weekly
	3	Full face - live air	A	Y	QL, QT	weekly

¹Use the following codes to designate average usage:

A = Daily
 B = Weekly
 C = Monthly
 D = Once a year
 E = Other (specify) _____

²Use the following codes to designate the type of fit test:

QL = Qualitative
 QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI ☐ Process type Polyurethane Foam Manufacture + ~~Polystyrene~~
 Work area Section 1
Restricted access, signs and worker training

9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type Polyurethane Foam Manufacture
 Work area Section 1

Housekeeping Tasks	Less Than Once Per Day	1-2 Times Per Day	3-4 Times Per Day	More Than 4 Times Per Day
Sweeping	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
Vacuuming	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
Water flushing of floors	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>

Other (specify)

See below

* Have no routine leaks or spills so do only routine housekeeping

☒ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type Polyurethan Foam Pie Polymer Manufacturer

Work area Section 2

Restricted access, signs and
worker training

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type Polyurethan Foam Pie Polymer Mfg.

Work area Section 2

<u>Housekeeping Tasks</u>	<u>Less Than Once Per Day</u>	<u>1-2 Times Per Day</u>	<u>3-4 Times Per Day</u>	<u>More Than 4 Times Per Day</u>
Sweeping	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
Vacuuming	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
Water flushing of floors	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>

Other (specify)

see below

* Have no routine leaks or spills so
do only routine housekeeping

☒ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type Polyurethane Foam Manufacturing

Work area Section 3

Restricted access, signs and
worker training

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type Polyurethane Foam Manufacturing

Work area Section 3

Housekeeping Tasks	Less Than Once Per Day	1-2 Times Per Day	3-4 Times Per Day	More Than 4 Times Per Day
Sweeping	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>
Vacuuming	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>
Water flushing of floors	<u>NA</u>	<u> </u>	<u> </u>	<u> </u>

Other (specify)

see below

* Have no routine leaks or spills so
do only routine housekeeping

☐ Mark (X) this box if you attach a continuation sheet.

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure

Yes 1

No 2

Emergency exposure

Yes 1

No 2

If yes, where are copies of the plan maintained?

Routine exposure: Plant office

Emergency exposure: Section 2 (Plant Production area)

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

Yes 1

No 2

If yes, where are copies of the plan maintained?

Plant Office

Has this plan been coordinated with state or local government response organizations? Circle the appropriate response.

Yes 1

No 2

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

Plant safety specialist 1

Insurance carrier 2

OSHA consultant 3

Other (specify) _____ 4

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 10 ENVIRONMENTAL RELEASE

General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

PART A GENERAL INFORMATION

10.01 Where is your facility located? Circle all appropriate responses.

CBI

- ☐ Industrial area 1
- Urban area 2
- Residential area 3
- Agricultural area 4
- Rural area 5
- Adjacent to a park or a recreational area 6
- Within 1 mile of a navigable waterway 7
- Within 1 mile of a school, university, hospital, or nursing home facility 8
- Within 1 mile of a non-navigable waterway 9
- Other (specify) _____ 10

☐ Mark (X) this box if you attach a continuation sheet.

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude 33 ° 0 , _____ "

Longitude 117 ° 42 , _____ "

UTM coordinates Zone _____, Northing _____, Easting _____

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitation UK inches/year

Predominant wind direction South West

10.04 Indicate the depth to groundwater below your facility.

Depth to groundwater 20 meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of CBI Y, N, and NA.)

On-Site Activity	Environmental Release		
	Air	Water	Land
Manufacturing	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Importing	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Processing	<u>Y</u>	<u>N</u>	<u>N</u>
Otherwise used	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Product or residual storage	<u>N</u>	<u>N</u>	<u>N</u>
Disposal	<u>N</u>	<u>N</u>	<u>N</u>
Transport	<u>N</u>	<u>N</u>	<u>N</u>

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐ Quantity discharged to the air 11 kg/yr ± UK %
Quantity discharged in wastewaters Ø kg/yr ± Ø %
Quantity managed as other waste in on-site treatment, storage, or disposal units 50 ^{*see below} kg/yr ± UK %
Quantity managed as other waste in off-site treatment, storage, or disposal units NA kg/yr ± NA %

* Note 50 kg/yr figure is estimated from filter drainage, valve drip, equipment maintenance, etc and is probably an excessive figure. Also note material is all 100% reacted on site which makes it an inert substance and no longer toxic.

☐ Mark (X) this box if you attach a continuation sheet.

CBI

[]

Process type

Pre Polymer Manufacture

[illegible]

X Note: Carbon Filters should approach 100% efficiency

☐ Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

Process type _____

Point ID	Source Code
1	1
2	2
3	3
4	4
5	5
6	6
7	7
8	8
9	9
10	10
11	11
12	12
13	13
14	14
15	15
16	16
17	17
18	18
19	19
20	20
21	21
22	22
23	23
24	24
25	25
26	26
27	27
28	28
29	29
30	30
31	31
32	32
33	33
34	34
35	35
36	36
37	37
38	38
39	39
40	40
41	41
42	42
43	43
44	44
45	45
46	46
47	47
48	48
49	49
50	50
51	51
52	52
53	53
54	54
55	55
56	56
57	57
58	58
59	59
60	60
61	61
62	62
63	63
64	64
65	65
66	66
67	67
68	68
69	69
70	70
71	71
72	72
73	73
74	74
75	75
76	76
77	77
78	78
79	79
80	80
81	81
82	82
83	83
84	84
85	85
86	86
87	87
88	88
89	89
90	90
91	91
92	92
93	93
94	94
95	95
96	96
97	97
98	98
99	99
100	100

Description of Emission Point Source

* See attachment at rear

☐ Mark (X) this box if you attach a continuation sheet.

* See attachments at rear

10.10 Emission Characteristics -- Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

Point Source ID Code	Physical State ¹	Average Emissions (kg/day)	Frequency ² (days/yr)	Duration ³ (min/day)	Average Emission Factor ⁴	Maximum Emission Rate (kg/min)	Maximum Emission Rate Frequency (events/yr)	Maximum Emission Rate Duration (min/event)
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____

¹Use the following codes to designate physical state at the point of release:

G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) _____

²Frequency of emission at any level of emission

³Duration of emission at any level of emission

⁴Average Emission Factor -- Provide estimated (\pm 25 percent) emission factor (kg of emission per kg of production of listed substance)

☐ Mark (X) this box if you attach a continuation sheet.

CBI

[]

[illegible]

³Use the following codes to designate vent type:

V = Vertical

☐ Mark (X) this box if you attach a continuation sheet.

10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09.
Photocopy this question and complete it separately for each emission point source.

CBI

☐

Point source ID code

Size Range (microns)

Mass Fraction (% ± % precision)

< 1

≥ 1 to < 10

≥ 10 to < 30

≥ 30 to < 50

≥ 50 to < 100

≥ 100 to < 500

≥ 500

Total = 100%

N/A

☐ Mark (X) this box if you attach a continuation sheet.

PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type _____

Percentage of time per year that the listed substance is exposed to this process type %

	Number of Components in Service by Weight Percent of Listed Substance in Process Stream					
Equipment Type	Less than 5%	5-10%	11-25%	26-75%	76-99%	Greater than 99%
Pump seals ¹	<i>* See attachment at</i>					
Packed						
Mechanical						
Double mechanical ²	<i>seals</i>					
Compressor seals ¹						
Flanges						
Valves						
Gas ³						
Liquid						
Pressure relief devices ⁴ (Gas or vapor only)						
Sample connections						
Gas						
Liquid						
Open-ended lines ⁵ (e.g., purge, vent)						
Gas						
Liquid						

¹List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.

10.13 (continued)

²If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

³Conditions existing in the valve during normal operation

⁴Report all pressure relief devices in service, including those equipped with control devices

⁵Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

CBI

☐

a. Number of Pressure Relief Devices	b. Percent Chemical in Vessel ¹	c. Control Device	d. Estimated Control Efficiency ²
N/A			

¹Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

²The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI ☐ ** See attachment at rear*

Equipment Type	Leak Detection	Detection Device ¹	Frequency of Leak Detection (per year)	Repairs Initiated (days after detection)	Repairs Completed (days after initiated)
	Concentration (ppm or mg/m ³) Measured at _____ Inches from Source				
Pump seals					
Packed	_____	_____	_____	_____	_____
Mechanical	_____	_____	_____	_____	_____
Double mechanical	_____	_____	_____	_____	_____
Compressor seals	_____	_____	_____	_____	_____
Flanges	_____	_____	_____	_____	_____
Valves					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Pressure relief devices (gas or vapor only)	_____	_____	_____	_____	_____
Sample connections					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____
Open-ended lines					
Gas	_____	_____	_____	_____	_____
Liquid	_____	_____	_____	_____	_____

¹Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

PART E NON-ROUTINE RELEASES

10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

<u>Release</u>	<u>Date Started</u>	<u>Time (am/pm)</u>	<u>Date Stopped</u>	<u>Time (am/pm)</u>
<u>1</u>	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
<u>2</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>3</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>4</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>5</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>6</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

10.24 Specify the weather conditions at the time of each release.

<u>Release</u>	<u>Wind Speed (km/hr)</u>	<u>Wind Direction</u>	<u>Humidity (%)</u>	<u>Temperature (°C)</u>	<u>Precipitation (Y/N)</u>
<u>1</u>	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>2</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>3</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>4</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>5</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u>6</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* Note: Have not had a release
in history of firm which was
not contained and deactivated

☐ Mark (X) this box if you attach a continuation sheet.

APPENDIX I: List of Continuation Sheets

Attach continuation sheets for sections of this form and optional information after this page. In column 1, clearly identify the continuation sheet by listing the question number to which it relates. In column 2, enter the inclusive page numbers of the continuation sheet for each question number.

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.

MATERIAL SAFETY DATA SHEET

Mobay Corporation

A Bayer USA INC. COMPANY

Bayer



DIVISION ADDRESS

MOBAY CORPORATION
Polyurethane Division
Mobay Road
Pittsburgh, PA 15205-9741

ISSUE DATE
SUPERSEDES

3/21/88
9/14/87

TRANSPORTATION EMERGENCY: CALL CHEMTREC
TELEPHONE NO: 800-424-9300; DISTRICT OF COLUMBIA: 202-483-7616

MOBAY NON-TRANSPORTATION EMERGENCY NO:
(412) 923-1800

I. PRODUCT IDENTIFICATION

PRODUCT NAME.....: Mondur TD-80 (All Grades)
PRODUCT CODE NUMBER.....: E-002
CHEMICAL FAMILY.....: Aromatic Isocyanate
CHEMICAL NAME.....: Toluene Diisocyanate (TDI)
SYNONYMS.....: Benzene, 1,3-diisocyanato methyl-
CAS NUMBER.....: 26471-62-5
T.S.C.A. STATUS.....: On Inventory
OSHA HAZARD COMMUNICATION
STATUS.....: This product is hazardous under the criteria of
the Federal OSHA Hazard Communication Standard 29 CFR 1910.1200.
CHEMICAL FORMULA.....: $C_9H_6N_2O_2$

II. HAZARDOUS INGREDIENTS

COMPONENTS:	%:	OSHA-PEL	ACGIH-TLV
2,4-Toluene Diisocyanate (TDI) CAS# 584-84-9	80%	0.02 ppm Ceiling	0.005 ppm TWA 0.02 ppm STEL
2,6-Toluene Diisocyanate (TDI) CAS# 91-08-7	20%	Not Established	Not Established

III. PHYSICAL DATA

APPEARANCE.....: Liquid
COLOR.....: Water white to pale yellow
ODOR.....: Sharp, pungent
ODOR THRESHOLD.....: Greater than TLV of 0.005 ppm
MOLECULAR WEIGHT.....: 174
MELT POINT/FREEZE POINT...: Approx. 55°F (13°C)
BOILING POINT.....: Approx. 484°F (251°C)
VAPOR PRESSURE.....: Approx. 0.025 mmHg @ 77°F (25°C)
VAPOR DENSITY (AIR=1).....: 6.0
pH.....: Not Applicable
SPECIFIC GRAVITY.....: 1.22 @ 77°F (25°C)
BULK DENSITY.....: 10.18 lbs/gal
SOLUBILITY IN WATER.....: Reacts slowly with water at normal room
temperature to liberate CO₂ gas.
% VOLATILE BY VOLUME.....: Negligible

Product Code: E-002

Page 1 of 8

IV. FIRE & EXPLOSION DATA

FLASH POINT °F(°C).....: 260°F (127°C) Pensky-Martens Closed Cup

FLAMMABLE LIMITS -

Le1.....: 0.9%

Ue1.....: 9.5%

EXTINGUISHING MEDIA.....: Dry chemical (e.g. monoammonium phosphate, potassium sulfate, and potassium chloride), carbon dioxide, high expansion (proteinic) chemical foam, water spray for large fires. Caution: Reaction between water or foam and hot TDI can be vigorous.

SPECIAL FIRE FIGHTING PROCEDURES/UNUSUAL FIRE OR EXPLOSION HAZARDS:

Full emergency equipment with self-contained breathing apparatus and full protective clothing (such as rubber gloves, boots, bands around legs, arms and waist) should be worn by fire fighters. No skin surface should be exposed. During a fire, TDI vapors and other irritating, highly toxic gases may be generated by thermal decomposition or combustion. (See Section VIII). At temperatures greater than 350°F (177°C) TDI forms carbodiimides with the release of CO₂, which can cause pressure build-up in closed containers. Explosive rupture is possible. Therefore, use cold water to cool fire-exposed containers.

V. HUMAN HEALTH DATA

PRIMARY ROUTE(S) OF

ENTRY.....: Inhalation. Skin contact from liquid, vapors or aerosols.

EFFECTS AND SYMPTOMS OF OVEREXPOSURE

INHALATION

Acute Exposure. TDI vapors or mist at concentrations above the TLV can irritate (burning sensation) the mucous membranes in the respiratory tract (nose, throat, lungs) causing runny nose, sore throat, coughing, chest discomfort, shortness of breath and reduced lung function (breathing obstruction). Persons with a preexisting, nonspecific bronchial hyperactivity can respond to concentrations below the TLV with similar symptoms as well as asthma attack. Exposure well above the TLV may lead to bronchitis, bronchial spasm and pulmonary edema (fluid in lungs). These effects are usually reversible. Chemical or hypersensitive pneumonitis, with flu-like symptoms (e.g., fever, chills), has also been reported. These symptoms can be delayed up to several hours after exposure.

Chronic Exposure. As a result of previous repeated overexposures or a single large dose, certain individuals may develop isocyanate sensitization (chemical asthma) which will cause them to react to a later exposure to isocyanate at levels well below the TLV. These symptoms, which can include chest tightness, wheezing, cough, shortness of breath or asthmatic attack, could be immediate or delayed up to several hours after exposure. Similar to many non-specific asthmatic responses, there are reports that once sensitized an individual can experience these symptoms upon exposure to dust, cold air or other irritants. This increased lung sensitivity can persist for weeks and in severe cases for several years. Chronic overexposure to isocyanate has also been reported to cause lung damage (including decrease in lung function) which may be permanent. Sensitization can either be temporary or permanent.

V. HUMAN HEALTH DATA (Continued)

SKIN CONTACT

Acute Exposure. Isocyanates react with skin protein and moisture and can cause irritation which may include the following symptoms: reddening, swelling, rash, scaling or blistering. Cured material is difficult to remove.

Chronic Exposure. Prolonged contact can cause reddening, swelling, rash, scaling, blistering, and, in some cases, skin sensitization. Individuals who have developed a skin sensitization can develop these symptoms as a result of contact with very small amounts of liquid material or as a result of exposure to vapor.

EYE CONTACT

Acute Exposure. Liquid, aerosols or vapors are severely irritating and can cause pain, tearing, reddening and swelling. If left untreated, corneal damage can occur and injury is slow to heal. However, damage is usually reversible. See Section VI for treatment.

Chronic Exposure. Prolonged vapor contact may cause conjunctivitis.

INGESTION

Acute Exposure. Can result in irritation and corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

Chronic Exposure. None found.

MEDICAL CONDITIONS

AGGRAVATED BY EXPOSURE... Asthma, other respiratory disorders (bronchitis, emphysema, bronchial hyperactivity), skin allergies, eczema.

CARCINOGENICITY..... No carcinogenic activity was observed in lifetime inhalation studies in rats and mice (International Isocyanate Institute).

NTP..... The National Toxicology Program reported that TDI caused an increase in the number of tumors in exposed rats over those counted in non-exposed rats. The TDI was administered in corn-oil and introduced into the stomach through a tube. Based on this study, the NTP has listed TDI as a substance that may reasonably be anticipated to be a carcinogen in its Fourth Annual Report on Carcinogens.

IARC..... IARC has announced that it will list TDI as a substance for which there is sufficient evidence for its carcinogenicity in experimental animals but inadequate evidence for the carcinogenicity of TDI to humans (IARC Monograph 39).

OSHA..... Not listed.

EXPOSURE LIMITS

OSHA PEL..... 0.02 ppm Ceiling

ACGIH TLV..... 0.005 ppm TWA/0.02 ppm STEL

VI. EMERGENCY & FIRST AID PROCEDURES

EYE CONTACT..... Flush with copious amounts of water, preferably lukewarm for at least 15 minutes holding eyelids open all the time. Refer individual to physician or an ophthalmologist for immediate follow-up.

VI. EMERGENCY & FIRST AID PROCEDURE (Continued)

SKIN CONTACT.....: Remove contaminated clothing immediately. Wash affected areas thoroughly with soap and water for at least 15 minutes. Tincture of green soap and water is also effective in removing isocyanates. Wash contaminated clothing thoroughly before reuse. For severe exposures, get under safety shower after removing clothing, then get medical attention. For lesser exposures, seek medical attention if irritation develops or persists after the area is washed.

INHALATION.....: Move to an area free from risk of further exposure. Administer oxygen or artificial respiration as needed. Obtain medical attention. Asthmatic-type symptoms may develop and may be immediate or delayed up to several hours. Consult physician.

INGESTION.....: Do not induce vomiting. Give 1 to 2 cups of milk or water to drink. **DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.** Consult physician.

NOTE TO PHYSICIAN.....: Eyes. Stain for evidence of corneal injury. If cornea is burned, instill antibiotic steroid preparation frequently. Workplace vapors have produced reversible corneal epithelial edema impairing vision. Skin. This compound is a known skin sensitizer. Treat symptomatically as for contact dermatitis or thermal burns. Ingestion. Treat symptomatically. There is no specific antidote. Inducing vomiting is contraindicated because of the irritating nature of this compound. Respiratory. This compound is a known pulmonary sensitizer. Treatment is essentially symptomatic. An individual having a skin or pulmonary sensitization reaction to this material should be removed from exposure to any isocyanate.

VII. EMPLOYEE PROTECTION RECOMMENDATIONS

EYE PROTECTION.....: Liquid chemical goggles or full-face shield. Contact lenses should not be worn. If vapor exposure is causing irritation, use a full-face, air-supplied respirator.

SKIN PROTECTION.....: Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water. Cover as much of the exposed skin area as possible with appropriate clothing. If skin creams are used, keep the area covered only by the cream to a minimum.

RESPIRATORY PROTECTION.....: An approved positive pressure air-supplied respirator is required whenever TDI concentrations are not known or exceed the Short-Term Exposure or Ceiling Limit of 0.02 ppm or exceed the 8-hour Time Weighted Average TLV of 0.005 ppm. An approved air-supplied respirator with full facepiece must also be worn during spray application, even if exhaust ventilation is used. For emergency and other conditions where the exposure limits may be greatly exceeded, use an approved, positive pressure self-contained breathing apparatus. TDI has poor warning properties since the odor at which TDI can be smelled is substantially higher than 0.02 ppm. Observe OSHA regulations for respirator use (29 CFR 1910.134).

VII. EMPLOYEE PROTECTION RECOMMENDATIONS (Continued)

VENTILATION.....: Local exhaust should be used to maintain levels below the TLV whenever TDI is handled, processed, or spray-applied. At normal room temperatures (70°F) TDI levels quickly exceed the TLV unless properly ventilated. Standard reference sources regarding industrial ventilation (e.g., ACGIH Industrial Ventilation) should be consulted for guidance about adequate ventilation.

MONITORING.....: TDI exposure levels must be monitored by accepted monitoring techniques to ensure that the TLV is not exceeded. (Contact Mobay for guidance). See Volume 1 (Chapter 17) and Volume 3 (Chapter 3) in Patty's Industrial Hygiene and Toxicology for sampling strategy.

MEDICAL SURVEILLANCE.....: Medical supervision of all employees who handle or come in contact with TDI is recommended. These should include preemployment and periodic medical examinations with respiratory function tests (FEV₁, FVC as a minimum). Persons with asthmatic-type conditions, chronic bronchitis, other chronic respiratory diseases or recurrent skin eczema or sensitization should be excluded from working with TDI. Once a person is diagnosed as sensitized to TDI, no further exposure can be permitted.

OTHER.....: Safety showers and eyewash stations should be available. Educate and train employees in safe use of product. Follow all label instructions.

VIII. REACTIVITY DATA

STABILITY.....: Stable under normal conditions.

POLYMERIZATION.....: May occur if in contact with moisture or other materials which react with isocyanates. Self-reaction may occur at temperatures over 350°F (177°C) or at lower temperatures if sufficient time is involved. See Section IV.

INCOMPATIBILITY

(MATERIALS TO AVOID).....: Water, amines, strong bases, alcohols. Will cause some corrosion to copper alloys and aluminum. Reacts with water to form heat, CO₂, and insoluble ureas.

HAZARDOUS DECOMPOSITION

PRODUCTS.....: By high heat and fire: carbon monoxide, oxides of nitrogen, traces of HCN, TDI vapors and mist.

IX. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Evacuate and ventilate spill area; dike spill to prevent entry into water system; wear full protective equipment, including respiratory equipment during clean-up. (See Section VII).

Major Spill: Call Mobay at 412/923-1800. If transportation spill, call CHEMTREC 800/424-9300. If temporary control of isocyanate vapor is required, a blanket of protein foam (available at most fire departments) may be placed over the spill. Large quantities may be pumped into closed, but not sealed, container for disposal.

IX. SPILL OR LEAK PROCEDURES (Continued)

Minor Spill: Absorb isocyanate with sawdust or other absorbent, shovel into suitable unsealed containers, transport to well-ventilated area (outside) and treat with neutralizing solution: mixture of water (80%) with non-ionic surfactant Tergitol TMN-10 (20%), or; water (90%), concentrated ammonia (3-8%) and detergent (2%). Add about 10 parts of neutralizer per part of isocyanate, with mixing. Allow to stand uncovered for 48 hours to let CO₂ escape.

Clean-up: Decontaminate floor with decontamination solution letting stand for at least 15 minutes.

CERCLA (SUPERFUND) REPORTABLE QUANTITY: 100 pounds for TDI

WASTE DISPOSAL METHOD.....: Follow all federal, state or local regulations. TDI must be disposed of in a permitted incinerator or landfill. Incineration is the preferred method for liquids. Solids are usually incinerated or landfilled. Empty containers must be handled with care due to product residue. Decontaminate containers prior to disposal. Empty decontaminated containers should be crushed to prevent reuse. DO NOT HEAT OR CUT EMPTY CONTAINER WITH ELECTRIC OR GAS TORCH. (See Sections IV and VIII). Vapors and gases may be highly toxic.

RCRA STATUS.....: TDI is listed as a hazardous waste (No. U-223) under Title 40 Code of Federal Regulations, Section 261.33 (f). The residue from decontaminating a TDI spill is also classified as a hazardous waste under Section 261.3 (c)(2) or RCRA.

X. SPECIAL PRECAUTIONS & STORAGE DATA

STORAGE TEMPERATURE

(MIN./MAX.).....: 70°F (21°C)/90°F (32°C)

AVERAGE SHELF LIFE.....: 12 months

SPECIAL SENSITIVITY

(HEAT, LIGHT, MOISTURE): If container is exposed to high heat, 375°F (177°C) it can be pressurized and possibly rupture. TDI reacts slowly with water to form polyureas and liberates CO₂ gas. This gas can cause sealed containers to expand and possibly rupture.

PRECAUTIONS TO BE TAKEN

IN HANDLING AND STORING.: Store in tightly closed containers to prevent moisture contamination. Do not reseal if contamination is suspected. Prevent all contact. Do not breathe the vapors. Warning properties (irritation of the eyes, nose and throat or odor) are not adequate to prevent chronic overexposure from inhalation. This material can produce asthmatic sensitization upon either single inhalation exposure to a relatively high concentration or upon repeated inhalation exposures to lower concentrations. Exposure to vapors of heated TDI can be extremely dangerous. Employee education and training in safe handling of this product are required under the OSHA Hazard Communication Standard.

XI. SHIPPING DATA

D.O.T. SHIPPING NAME.....: Toluene Diisocyanate
TECHNICAL SHIPPING NAME....: Toluene Diisocyanate
D.O.T. HAZARD CLASS.....: Poison B
UN/NA NO.....: UN 2078
PRODUCT RQ.....: 100 pounds
D.O.T. LABELS.....: Poison
D.O.T. PLACARDS.....: Poison
FRT. CLASS BULK.....: Toluene Diisocyanate
FRT. CLASS PKG.....: Chemicals, NOI (Toluene Diisocyanate) NMFC 60000
PRODUCT LABEL.....: Mondur TD-80 Product Label

XII. ANIMAL TOXICITY DATA

ACUTE TOXICITY

ORAL, LD50.....: Range of 4130-6170 mg/kg (Rats and Mice)
DERMAL, LD50.....: Greater than 10,000 mg/kg (Rabbits)
INHALATION, LC50.(4 hr): Range of 16-50 ppm (Rat), 10 ppm (Mouse),
11 ppm (Rabbit), 13 ppm (Guinea Pig).
EYE EFFECTS.....: Severe eye irritant capable of inducing corneal opacity.

SKIN EFFECTS.....: Moderate skin irritant. Primary dermal irritation score: 4.12/8.0 (Draize). However, repeated or prolonged contact may culminate in severe skin irritation and/or corrosion.

SENSITIZATION.....: Skin sensitizer in guinea pigs. One study using guinea pigs reported that repeated skin contact with TDI caused respiratory sensitization. Although poorly defined in experimental animal models, TDI is known to be a pulmonary sensitizer in humans. In addition, there is some evidence that cross-sensitization between different types of diisocyanates may occur.

SUB-CHRONIC/CHRONIC TOXICITY: Sub-chronic and chronic animal studies show that the primary effects of inhaling vapors and/or aerosols of TDI are restricted to the pulmonary systems. Emphysema, pulmonary edema, pneumonitis and rhinitis are common pathologic effects. Extended exposures to as low as 0.1 ppm TDI have induced pulmonary inflammation.

OTHER

CARCINOGENICITY.....: The NTP conducted carcinogenesis studies of a commercial grade TDI using rats and mice in which the test material was diluted in corn oil and administered by gavage. The investigators concluded that TDI was carcinogenic in male and female rats (fibrosarcomas, pancreatic adenomas, neoplastic liver nodules and mammary gland fibrosarcomas) and female mice (hemangiosarcomas and hepatocellular adenomas). However, chronic inhalation studies in which rats and mice were exposed to 0.05 and 0.15 ppm TDI (10-30 times recommended TLV, 8-hr level) induced no treatment-related tumorigenic effects. In these studies, both exposure levels produced extensive irritation to the nasal passages and upper respiratory system of the test animals indicating that suitable effective exposures were administered.

XII. ANIMAL TOXICITY DATA (Continued)

MUTAGENICITY.....: TDI is positive in the Ames assay with activation. However, mammalian cell transformation assays using human lung cells and Syrian hamster kidney cells were negative, as were micronucleus tests using rats and mice.

AQUATIC TOXICITY.....: LC₅₀ - 96 hr (static): 165 mg/liter (Fathead minnow)
LC₅₀ - 96 hr (static): Greater than 508 mg/liter (Grass shrimp)
LC₅₀ - 24 hr (static): Greater than 500 mg/liter (Daphnia magna)

XIII. APPROVALS

REASON FOR ISSUE.....: Correcting Section II, Hazardous Ingredients
PREPARED BY.....: G. L. Copeland
APPROVED BY.....: J. H. Chapman
TITLE.....: Manager, Product Safety - Polyurethane

BUILDING IS 50' X 100' CONCRETE
TILT UP CONSTRUCTION WITH ONLY
TWO DOORS.

TDI ENTERS BUILDING
HERE FROM TANK TRUCK

SECTION 2
POLYURETHANE PREPOLYMER
RESIN MANUFACTURE

LABOR CATAGORY D

DOOR
RAISED
TO FORM
DIKE

PLANT LAYOUT SHOWING 3 WORK AREAS

DOOR
RAISED
TO FORM
DIKE

ALL FUMES
FROM
BUILDING
EXHAUST
THROUGH
30 HP
BLOWER
LOCATED
HERE

SECTION 1
POLYURETHANE FOAM PLASTIC MANUFACTURE

LABOR CATAGORY A AND B

SECTION 3
POLYURETHANE FOAM PLASTIC MANUFACTURE
LABOR CATAGORY C

BUILDING IS 50' X 100' CONCRETE
TILT UP CONSTRUCTION WITH ONLY
TWO DOORS.

TDI ENTERS BUILDING
HERE FROM TANK TRUCK

SECTION 1 POLYURETHANE FOAM MANUFACTURE

SCALE



LIQUID PREPOLYMER RESIN CONTAINING TDI PUMPED FROM STATION 2 TO A SCALE WHERE THE PREPOLYMER IS WEIGHED WITH A POLYURETHANE POLYOL, SILICONE, AMINE CATALYST AND WATER BLEND AND THEN HAND MIXED AND POURED INTO MOLDS.

IN SHADED AREA THERE ARE 17 MOLD STATIONS WHICH ARE EQUIPPED WITH ENGINEERING CONTROLS TO REMOVE THE FUMES TO A CENTRAL EXHAUST SYSTEM. THIS SYSTEM IS OPERATING UNDER AN OSHA VARIANCE AND KEEPS FUME LEVELS UNDER .002 PPM. ALSO LIVE AIR RESPIRATORS ARE USED WHEN IN THE MOLDING AREA. ALSO SHADED AREA IS RESTRICTED ACCESS.

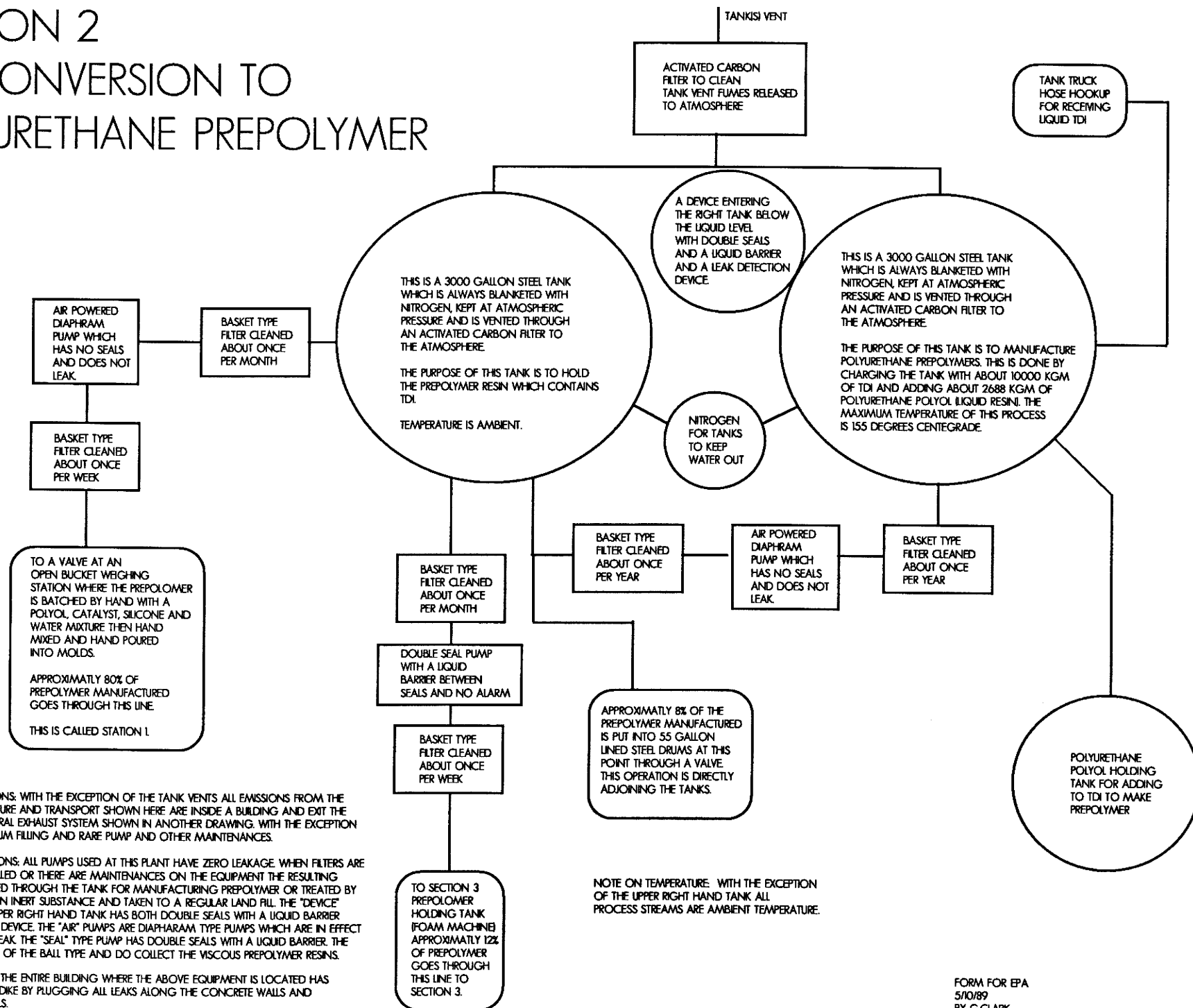
ALL FUMES FROM BUILDING EXHAUST THROUGH 30 HP BLOWER LOCATED HERE

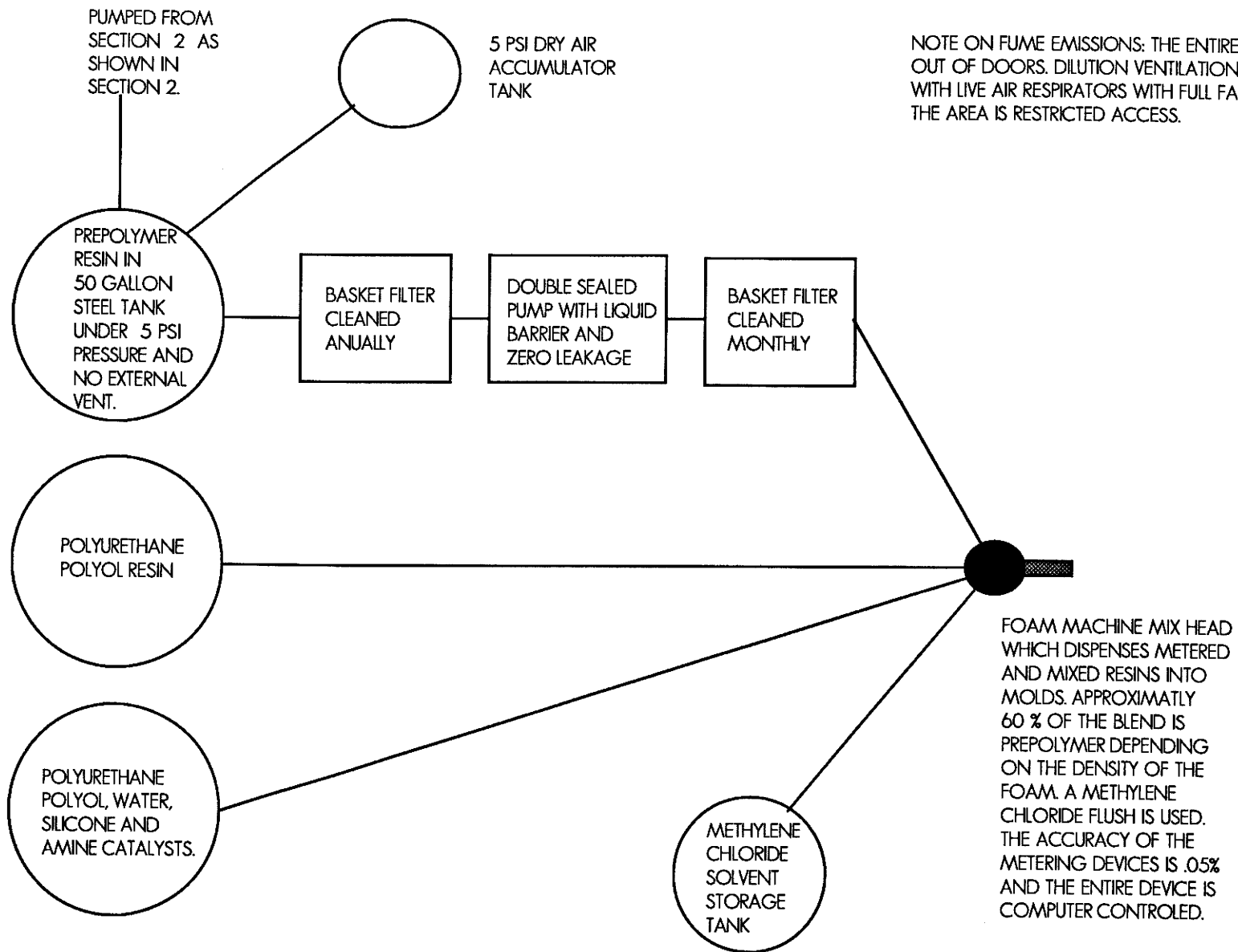
SECTION 2

TDI CONVERSION TO

POLYURETHANE PREPOLYMER

RESIN





NOTE ON FUME EMISSIONS: THE ENTIRE OPERATION IS OUT OF DOORS. DILUTION VENTILATION IS USED ALONG WITH LIVE AIR RESPIRATORS WITH FULL FACE COVERING. THE AREA IS RESTRICTED ACCESS.

SECTION 3 POLYURETHANE FOAM MANUFACTURE (FOAM MACHINE)

NOTE ON THE SOLVENT FLUSH: THE METHYLENE CHLORIDE SOLVENT IS CAPTURED AFTER USE AND RECOVERED IN AN ON SITE RECOVERY UNIT. THE POLYURETHANE WASTE IS TOTALLY REACTED AND TAKEN TO A REGULAR LANDFILL.

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OVERVIEW

Due to my lack of understanding in many areas of this reporting form I have assumed I have made some errors. Since my firm is small and the process simple I will try to give simple details as a supplement or to correct error.

This document will try to follow the form where possible.

WHAT WE MANUFACTURE

We purchase TDI (Toluene Di Isocynate in the 80/20 mixture) and some other commodity chemicals (which are not reportable). Also we purchase some urethane cell stabilizers (silicone) and catalysts (amine).

We convert the commodity chemicals into a polyol for urethanes which is a fairly inert liquid resin.

With the polyol we pre react some of the TDI into what is called a polyurethane prepolymer. This prepolymer has some unreacted TDI in it as well as some partially reacted TDI. The prepolymer is a viscous resin. The prepolymer should be treated or considered the equivalent of straight TDI.

100% of the TDI we purchase is converted to prepolymer. We have only one prepolymer product.

Of the prepolymer we manufacture we sell approximately 8% directly overseas as a component of a polyurethane foam resin system. Approximately 12% is converted into a polyurethane foam boardstock which is sold both domestically and exported. (Section 3 of the attachment.) The balance of our prepolymer is converted into a molded polyurethane foam and sold both domestically and exported. (Section 1 of the attachment.)

EMISSIONS, LEAKS, ETC. OF LIQUID TDI

We treat the prepolymer the same as the TDI in the discussion below.

We receive the TDI directly by tank truck.

We have only four pumps which move prepolymer and none which move TDI. The prepolymer is a viscous liquid. The type of pumps we use never leak under use.

We use small stainless steel basket filters. Some of these are almost never cleaned.

The entire cleaning program of the filters, equipment maintenance, valve drippings, etc. represents less than 50 kilograms of waste per year. All waste is reacted on site to a solid, inert polymer and sent to a regular landfill.

All other prepolymer is converted to rigid polyurethane foam or a solid polyurethane residue from solvent cleaning. Any wastes or scrap urethane plastic is taken to a regular landfill.

When we have off specification prepolymer we add it to future batches of prepolymer in small amounts per batch.

We have never had an emergency, formulation error, spill, etc. requiring the disposal of TDI or our prepolymer to an outside site.

Unless there is an accident workers never have skin contact with TDI or our prepolymer.

RESPIRATORS AND FUME EMISSIONS

We receive the TDI directly by tank truck. The tank it goes into has an activated carbon vent scrubber so the fume emissions from the tank are approaching zero. Also the prepolymer storage tanks either have the same vent or are under pressure. (See Section 2 and Section 3 diagrams.)

The building shown in the main diagram which contains all the foam molding in Section 1 and the prepolymer manufacture in Section 2 is vented from one 30 horsepower blower.

All employees working on the prepolymer manufacture and distribution use respirators when inspecting the tanks, changing filters, etc.

By the OSHA tests and suppliers tests we are not required to wear respirators. In practice, however, it is too dangerous not to wear a respirator due to chance air currents, the proximity to the raising foam, etc. Therefore we do wear respirators.

Section 1 or the molding area inside our building has an engineered and tested fume removal system which is monitored weekly per written OSHA instructions (as a part of an OSHA variance) using a commercial flow meter type device. Written records are kept of the testing.

Section 3 is out of doors and uses fans to move and dilute the air.

All workers in Sections 1 and Section 3 use respirators when actually reacting the prepolymer to polyurethane foam.

We use only one type of respirator. It is an OSHA approved full face mask using live air.

There is a weekly test made per a written form of all employees who use respirators. The test is administered by the plant safety department. There is a written record kept of all these tests. The testing was set up by OSHA Consulting, the respirator manufacturer and plant personnel.

There is a respirator training program for employees when they start working with respirators plus a re-training/safety program.

TEMPERATURE

With the exception to the prepolymer manufacture tank all temperatures are ambient/

PRESSURE

Tank pressures are ambient or at a maximum 5 psi on a tank in Section 3.

Line pressures would be an average of 75 psi and a maximum of 150 psi.

EQUIPMENT CONSTRUCTION

All vessels and piping is steel or stainless steel.

Pumps are stainless steel and of "leakproof" construction.

PHYSICAL STATE OF MATERIALS USED

All materials used in all process streams are a liquids with the exception of a nitrogen blanket on the two 3000 gallon tanks in Section 2.

METHYLENE CHLORIDE AND EMISSIONS

METHYLENE chloride is used as a solvent in Section 1 and section 3 to clean processing equipment. The METHYLENE chloride dilutes the mixed polyurethane foam resin (prepolymer, polyol, catalyst, etc.).

The spent methylene chloride solvent is stored in closed top 55 gallon drums. During the storage the prepolymer reacts with the other components to form a solid polyurethane plastic.

The 55 gallon drums are process through an on site recovery plant and the methylene chloride is in the most part recovered and re-used. The polyurethane is taken to a regular land fill after insuring that it is 100% reacted.

Annual loss of methylene chloride in this process was about 10200 kilograms in 1988.

WASTE

There are no by products of our process other than plastic foam scrap or totally reacted polyurethane solids. These are taken to a conventional landfill.

As a part of a totally separate process in a different building we use an unsaturated polyester laminating process. We use a water based brush cleaner a part of which leaves as a detergent and water in our sewer system and the balance as a solid polyester resin product. This system is

approved by local government agencies. The water based cleaner is a substitute for acetone or methylene chloride.

MEDICAL RECORDS / PHYSICAL EXAMINATIONS

All persons on our respirator program or who work around the TDI or prepolymer receive OSHA approved physical examinations every six months.

Records of the examinations are kept forever.

TRAINING PROGRAMS

There are plant safety programs run on a periodic basis using written lesson plans. TDI and the prepolymer are included in the training.

RESTRICTED ACCESS

There are signs and enforcement of restricted access areas or our so called "respirator" areas.

APR-17-89 MON 14:53 ID:MOBAY SHIPPING II

TEL NO:713-383-2411 X5361

#612 F01

Mobay Corporation

A Bayer USA INC. Company

Attn: Don Zaguer

Bayer



8500 West Bay Rd.
Baytown, Tx 77520

Telephone: 713-383-2411
FAX: 713-383-2411 x5361
TWX: 510-891-7790

Doc # 1254852

S/D 4-14-89

TC GATX 16805

260,100

70,300

189,800

QUALITY ASSURANCE LABORATORY

REPORT OF ANALYSIS

MON., 17 APR., 1989

PRODUCT: MONDUR TD-80 GRADE A

CUSTOMER: WEST COAST DIST.

LOT NUMBER: E-002

-9-0615

LOT APPROVAL DATE: 09:14:34 4/17/1989

TT/TC/DRUM #: GATX 16805

DOCUMENT#: 1254852

PURCHASE ORDER #:

Color	10.	APHA
2-4 CONTENT	80.2	%
2-6 TDI	19.8	%
Turbidity	0.	PQA Std
ASSAY	99.9	%
Acidity	0.004	%
HC	0.006	%

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QUALITY ASSURANCE SUPERVISOR: Charles R. Tucker

19

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DO NOT USE WELDING OR CUTTING TORCH ON THIS DRUM (EVEN WHEN EMPTY)

TOLUENE DI ISOCYNATE BASED PREPOLYMER

CAUTION

- * MAY CAUSE EYE AND SKIN IRRITATION
- * IS HARMFUL IF INHALED OR SWALLOWED
- * CONTAINS TOLUENE DI ISOCYNATE (TDI)
POLYMERIZED WITH A SATURATED POLYESTER

POISON

HANDLING AND STORAGE:

- * Avoid breathing vapor or mist. Avoid contact with eyes, skin and clothing. If in contact with body use approved plastic gloves and other necessary protective clothing.
- * Keep drum sealed at all times not actually filling or emptying. When filling or emptying do in place with adequate ventilation. Clean all spills immediately using the approved methods (TERGITOL). Refer to OSHA regulations. Use live air breathing apparatus when filling or emptying as required by CLARK FOAM safety policy and/or OSHA regulations.
- * Do not transfer contents to an unmarked container. Never apply pressure to drum. Loosen closure carefully. Cut drum into pieces using appropriate CLARK FOAM tools and approved technique prior to disposal into landfill trash container or removal from premises of CLARK FOAM.
- * Avoid heat and open flames. Do not breathe smoke from burning Prepolymer.
- * All containers that are used for Prepolymer must have standard TDI POISON LABELS - even after the Prepolymer is removed.

FIRST AID:

- EYES:** Immediately flush with water for a minimum of 15 minutes while lifting upper and lower eyelids. If possible use eyewash unit by the foam shop bathroom. Do not use any other substance. If redness or irritation persists, take Material Safety Data Sheet for TDI and get medical attention.
- SKIN:** Thoroughly flush with water. If there is a resin residue use soap. During the washing process stand outside or in an area with good ventilation or if required use live air respirators. If there is large quantity of Prepolymer on body, use with caution clean Methylene Chloride as solvent. Avoid breathing fumes. Remove and dispose of all articles of clothing or shoes which have become contaminated. If redness or irritation persists, get medical attention.
- INHALATION:** Remove affected person to fresh air. If not breathing give artificial respiration and take to Hospital Immediately. If breathing is difficult get medical attention.
- INGESTION:** Do not induce vomiting. Give two glasses of water or milk and take Material Safety Data Sheets and get medical attention IMMEDIATELY. Never give anything by mouth to an unconscious person.

NET

LBS.

FOR USE *ONLY *

ON

CLARK FOAM PREMISES

**BEFORE USING REVIEW MATERIAL SAFETY
DATA SHEETS FOR FURTHER INFORMATION
INCLUDING CHRONIC HEALTH EFFECTS**

ISSUED 4/10/87
REVISED - NONE
BY G. CLARK

CLARK FOAM PRODUCTS * 25887 CROWN VALLEY PARKWAY * SOUTH LAGUNA, CALIFORNIA 92677
EMERGENCY TELEPHONE NUMBER (714) 582-1431 (412) 923-1800

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BUILDING IS 50' X 100' CONCRETE
TILT UP CONSTRUCTION WITH ONLY
TWO DOORS.

09 MAY 22 AM 11: 54

TDI ENTERS BUILDING
HERE FROM TANK TRUCK

DISPATCH CONTROL
OFFICE

SECTION 2
POLYURETHANE PREPOLYMER
RESIN MANUFACTURE

LABOR CATAGORY D

DOOR

RAISED
TO FORM
DIKE

PLANT LAYOUT SHOWING 3 WORK AREAS

DOOR

RAISED
TO FORM
DIKE

ALL FUMES
FROM
BUILDING
EXHAUST
THROUGH
30 HP
BLOWER
LOCATED
HERE

SECTION 1
POLYURETHANE FOAM PLASTIC MANUFACTURE

LABOR CATAGORY A AND B

SECTION 3
POLYURETHANE FOAM PLASTIC MANUFACTURE
LABOR CATAGORY C

BUILDING IS 50' X 100' CONCRETE
TILT UP CONSTRUCTION WITH ONLY
TWO DOORS.

TDI ENTERS BUILDING
HERE FROM TANK TRUCK

SECTION 1 POLYURETHANE FOAM MANUFACTURE

SCALE



LIQUID PREPOLYMER RESIN CONTAINING TDI PUMPED
FROM STATION 2 TO A SCALE WHERE THE PREPOLYMER
IS WEIGHED WITH A POLYURETHANE POLYOL, SILICONE,
AMINE CATALYST AND WATER BLEND AND THEN HAND
MIXED AND POURED INTO MOLDS.

IN SHADED AREA THERE ARE 17 MOLD STATIONS
WHICH ARE EQUIPPED WITH ENGINEERING
CONTROLS TO REMOVE THE FUMES TO A
CENTRAL EXHAUST SYSTEM. THIS SYSTEM
IS OPERATING UNDER AN OSHA VARIANCE
AND KEEPS FUME LEVELS UNDER .002 PPM.
ALSO LIVE AIR RESPIRATORS ARE USED WHEN
IN THE MOLDING AREA. ALSO SHADED AREA IS
RESTRICTED ACCESS.

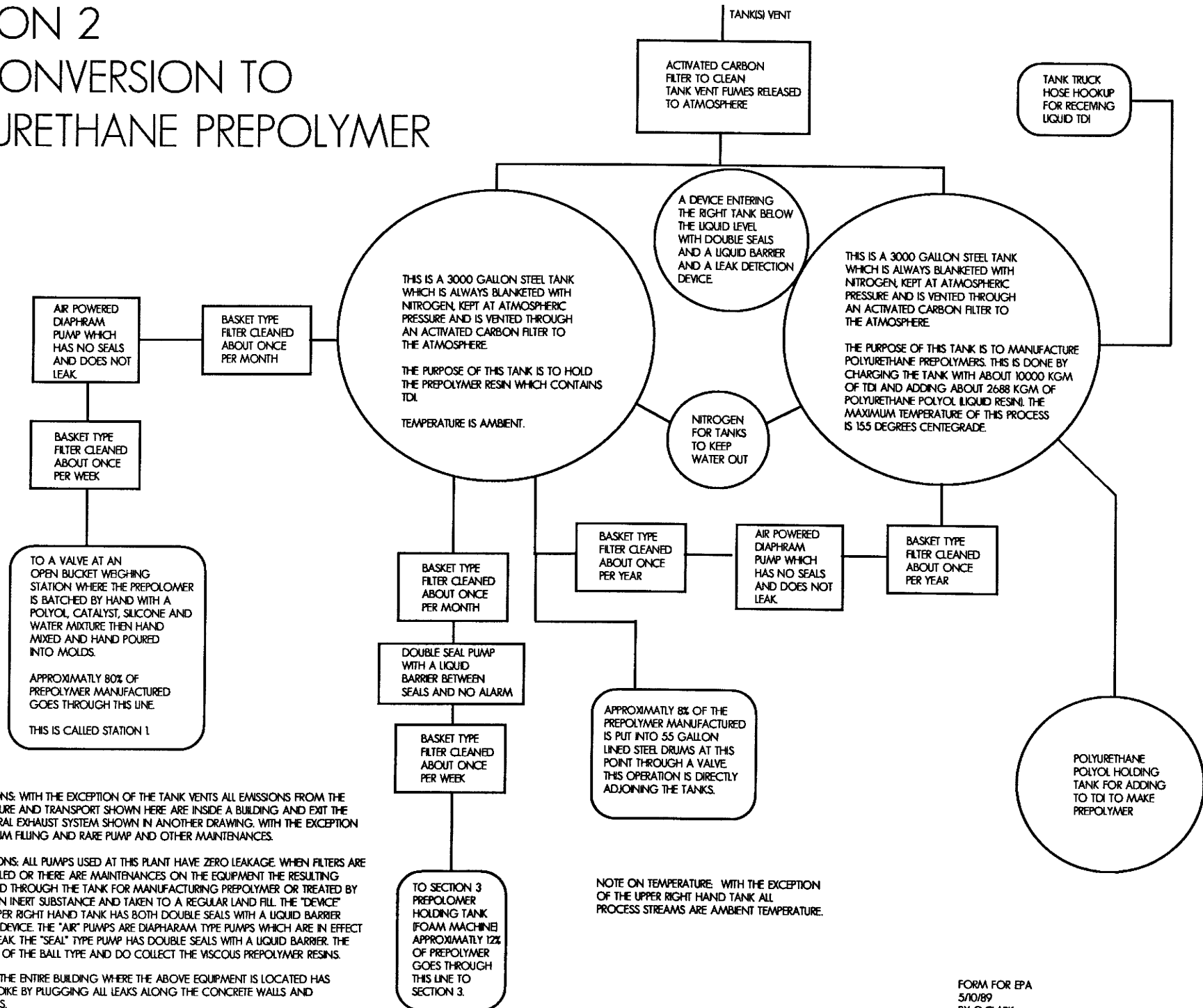
ALL FUMES
FROM
BUILDING
EXHAUST
THROUGH
30 HP
BLOWER
LOCATED
HERE

SECTION 2

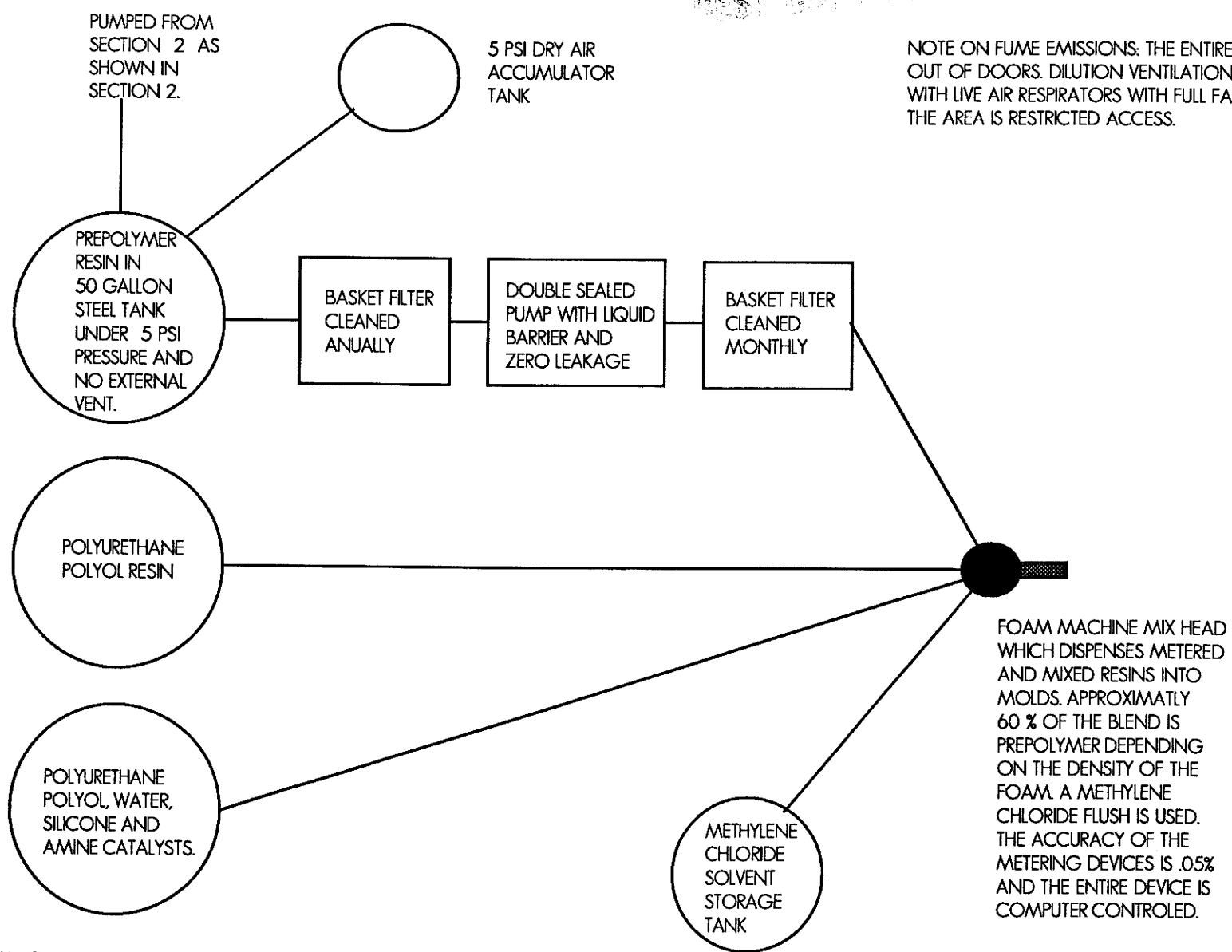
TDI CONVERSION TO

POLYURETHANE PREPOLYMER

RESIN



BEST COPY AVAILABLE



SECTION 3 POLYURETHANE FOAM MANUFACTURE (FOAM MACHINE)

NOTE ON THE SOLVENT FLUSH: THE METHYLENE CHLORIDE SOLVENT IS CAPTURED AFTER USE AND RECOVERED IN AN ON SITE RECOVERY UNIT. THE POLYURETHANE WASTE IS TOTALLY REACTED AND TAKEN TO A REGULAR LANDFILL.

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OVERVIEW

Due to my lack of understanding in many areas of this reporting form I have assumed I have made some errors. Since my firm is small and the process simple I will try to give simple details as a supplement or to correct error.

This document will try to follow the form where possible.

WHAT WE MANUFACTURE

We purchase TDI (Toluene Di Isocynate in the 80/20 mixture) and some other commodity chemicals (which are not reportable). Also we purchase some urethane cell stabilizers (silicone) and catalysts (amine).

We convert the commodity chemicals into a polyol for urethanes which is a fairly inert liquid resin.

With the polyol we pre react some of the TDI into what is called a polyurethane prepolymer. This prepolymer has some unreacted TDI in it as well as some partially reacted TDI. The prepolymer is a viscous resin. The prepolymer should be treated or considered the equivalent of straight TDI.

100% of the TDI we purchase is converted to prepolymer. We have only one prepolymer product.

Of the prepolymer we manufacture we sell approximately 8% directly overseas as a component of a polyurethane foam resin system. Approximately 12% is converted into a polyurethane foam boardstock which is sold both domestically and exported. (Section 3 of the attachment.) The balance of our prepolymer is converted into a molded polyurethane foam and sold both domestically and exported. (Section 1 of the attachment.)

EMISSIONS, LEAKS, ETC. OF LIQUID TDI

We treat the prepolymer the same as the TDI in the discussion below.

We receive the TDI directly by tank truck.

We have only four pumps which move prepolymer and none which move TDI. The prepolymer is a viscous liquid. The type of pumps we use never leak under use.

We use small stainless steel basket filters. Some of these are almost never cleaned.

The entire cleaning program of the filters, equipment maintenance, valve drippings, etc. represents less than 50 kilograms of waste per year. All waste is reacted on site to a solid, inert polymer and sent to a regular landfill.

All other prepolymer is converted to rigid polyurethane foam or a solid polyurethane residue from solvent cleaning. Any wastes or scrap urethane plastic is taken to a regular landfill.

When we have off specification prepolymer we add it to future batches of prepolymer in small amounts per batch.

We have never had an emergency, formulation error, spill, etc. requiring the disposal of TDI or our prepolymer to an outside site.

Unless there is an accident workers never have skin contact with TDI or our prepolymer.

RESPIRATORS AND FUME EMISSIONS

We receive the TDI directly by tank truck. The tank it goes into has an activated carbon vent scrubber so the fume emissions from the tank are approaching zero. Also the prepolymer storage tanks either have the same vent or are under pressure. (See Section 2 and Section 3 diagrams.)

The building shown in the main diagram which contains all the foam molding in Section 1 and the prepolymer manufacture in Section 2 is vented from one 30 horsepower blower.

All employees working on the prepolymer manufacture and distribution use respirators when inspecting the tanks, changing filters, etc.

By the OSHA tests and suppliers tests we are not required to wear respirators. In practice, however, it is too dangerous not to wear a respirator due to chance air currents, the proximity to the raising foam, etc. Therefore we do wear respirators.

Section 1 or the molding area inside our building has an engineered and tested fume removal system which is monitored weekly per written OSHA instructions (as a part of an OSHA variance) using a commercial flow meter type device. Written records are kept of the testing.

Section 3 is out of doors and uses fans to move and dilute the air.

All workers in Sections 1 and Section 3 use respirators when actually reacting the prepolymer to polyurethane foam.

We use only one type of respirator. It is an OSHA approved full face mask using live air.

There is a weekly test made per a written form of all employees who use respirators. The test is administered by the plant safety department. There is a written record kept of all these tests. The testing was set up by OSHA Consulting, the respirator manufacturer and plant personnel.

There is a respirator training program for employees when they start working with respirators plus a re-training/safety program.

TEMPERATURE

With the exception to the prepolymer manufacture tank all temperatures are ambient/

PRESSURE

Tank pressures are ambient or at a maximum 5 psi on a tank in Section 3.

Line pressures would be an average of 75 psi and a maximum of 150 psi.

EQUIPMENT CONSTRUCTION

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